



भारत सरकार/Government of India
खान मंत्रालय/Ministry of Mines
भारतीय खान ब्यूरो/Indian Bureau of Mines
हैदराबाद क्षेत्रीय कार्यालय/Hyderabad Regional Office



No. AP/NLG/MP/Lst-64/Hyd.

Room No.603,
6th Floor,CGO Towers,
Kavadiguda,Secunderabad.-50008
Date: 17.02.2021..

Shri A Subramanian,
Nominated Owner and Director,
1E, 11th Block, Aswani Amerisa Apartment,
Kawalsathamman KovilStreet,
Ramapuram,
Chennai 600089

Sub: Submission of Final Mine Closure Plan in respect of Anjani Limestone mine pit - III over an extent of 4.75 ha in of Gudimalkapuram (V) Chintalapalyem (M), Suryapet district, T.S. submitted under Rule 24(1) of MCDR, 2017.

Ref: Your letter no nil, dated.25.01.2021 received in this office on 02.02.2021.

Sir,

With reference to your letter cited above on the subject, the site inspection was carried out by Shri Madhusudan Yadav, ACOM on 10.02.2021 along with Shri P.R. Mishra, QP, Shri Srinivasa Raju, Mine Representative and found certain deficiencies as given in Annexure. The same scrutiny comments have already been forwarded on e mail ids of you and your Qualified Person as submitted in the document ie., info@anjaniment.com & earth_environment2008@yahoo.com

02. You are advised to attend the deficiencies as per the annexure and resubmit the document, complete in all respects, in three bound copies along with soft copy in the form of CD (3Nos.). In this regard you are directed to submit the Financial Assurance in the form of Bank Guarantee for the area put on use for Mining and allied activities @ Rs.Three lakhs/hectare for category 'A' mines provided that the minimum amount shall be Rs.Ten lakhs and @ Rs.Two Lakhs/hectare for category 'B' mines provided that the minimum amount shall be Rs.Five lakhs as per the provision of Rule 27(1) of MCDR, 2017 at the time of submission of final copies of the document within 15 (fifteen) days from the date of issue of this letter, failing which the document will be disposed without giving any further opportunity.

03. The para-wise clarification & the manner in which the deficiencies are attended should be given while forwarding modified document.

Yours faithfully,

Sh Kumar
17/2/21

(Shailendra Kumar)

Regional Controller of Mines

Copy to Sri P.R.Mishra, Qualified Person, -for information and necessary action.

Sh Kumar
17/2/21

(Shailendra Kumar)

Regional Controller of Mines

मूलपतिपरनहीं

खाननियंत्रक (द), भारतीय खानब्यूरो, बेंगलुरु।

शैलेन्द्र
17/2/21

(शैलेन्द्र कुमार)

क्षेत्रीय खाननियंत्रक

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Inspection report cum scrutiny comments on Final Mine Closure Plan of Anjani Limestone Mine-III of M/s. Anjani Portland Cement Ltd. over an area of 4.75 hectares in Gudimalkapuram village, Chintalapalem Mandal, Suryapet District, Telangana.

Introduction

1. The document submitted as per the chapters mentioned in Format of FMCP in IBM manual on appraisal of Mining Plan 2014.
2. The introduction chapter shall be re-casted properly as per the contents mentioned in FMCP format.
3. Reason for Final Mine Closure is mentioned as the mine is not found to be economically viable for mining which is to be justified properly.
4. The legal obligations, if any which the lessee is bound to implement the conditions imposed by the MoEF, State or Central Pollution Control Board or by any other organization describing the nature of conditions and compliance position thereof may be indicated and the copies of relevant documents may be attached as Annexure.
5. Copy of the resolution of the Board of Directors or any other appropriate authority as the case may be on the decision of closure of mine may be submitted.

Mine Description

6. The geology chapter shall be submitted properly.
7. The details of boreholes drilled in the mining lease shall be submitted correctly in page no. 7 and 8.
8. Total boreholes drilled in the mining lease are not depicted in the plans and sections.
9. The cut off grade and threshold limit of limestone shall be mentioned correctly in page no.9.
10. In the feasibility report the cost per tonne is mentioned as Rs.433.6/-, whereas the avg. cost per tonne from 2013-14 to 2017-18 of this said mine is Rs.168.36/-, also the other mining leases i.e., Anjani (Pit-1) & Anjani (Pit-4) cost per tonne in the year 2019-20 is Rs.235.82/- and Rs.243.96/- which is having a higher lead distance from mine pit to crusher compare to Anjani(Pit-3). Hence the estimated operating cost needs to be justified properly.
11. The estimated capital cost is submitted as Rs.192.91 lakhs, in which machinery cost is shown as Rs.143.4 lakhs. During inspection it was made to understand that machineries used in the said mine and other leases of the lessee are hired. Hence the capital cost of machinery needs to be justified.
12. Sensitivity study and cash flow statement in the feasibility report needs to be justified and the feasibility report is not having substantial data to prove that the project is not economically viable.
13. It is mentioned that major cost is incurred for dewatering, whereas during inspection it was made to understand that no dewatering done from the pit and no pumping records maintained.
14. In page no.10 it is mentioned that removal of overburden from the pit will be difficult, whereas no overburden generated in the mining area.
15. No production reported after the approval of Review of Mining Plan on 20-11-2017, whereas substantial difference is found in the Reserves and Resources estimation submitted in draft FMCP.
16. The mining method followed to win the mineral, extent of mechanization, mining machinery deployed, production level etc., shall be submitted.

Review of Implementation of Mining Plan

17. Review of implementation of Review of Mining Plan including 5 years PMCP upto final closure of mine shall be submitted.

Closure Plan

18. Submit the proposals to be implemented for reclamation and rehabilitation of mined-out land including the manner in which the actual size of pit will be restored for future use. The proposals may be supported with relevant plans and sections depicting the method of land restoration/reclamation/rehabilitation.
19. Report of hydrogeological study carried out in the area may be submitted.
20. Describe in detail the existing surface and ground water bodies available in the lease areas and the measures to be taken for protection of the same including control of erosion, sedimentation, siltation, water treatment, diversion of water courses, if any measures for protection of contamination of ground water from leaching etc., Quality and quantity of surface water bodies may also be indicated and corrective measures proposed to meet the water quality conforming the permissible limits may also be described.
21. Describe the existing air quality status. The corrective measures to be taken for prevention of air may be described.
22. In page no.13, it is mentioned that village settlement is present within the lease area. Clarify it.
23. Explain the safety measures implemented to prevent access to surface openings, excavations etc., and arrangements proposed during abandonment plan and upto the site being opened for general public may be described.

Time scheduling for abandonment

24. The details of time schedule of all abandonment operations shall be submitted. The manpower and other resources required for completion of proposed job may be described. The schedule of operations may also be supplemented by PERT, Bar chart etc.,

Abandonment Cost

25. Cost to be estimated based on the activities required for implementing the protective and rehabilitation measures including their maintenance and monitoring programme shall be submitted.

Financial Assurance

26. The financial assurance to be submitted with its particulars has to be indicated in the document.

Certificate

27. A certificate duly signed by the lessee to the effect that said closure plan complies all statutory rules, regulations, orders made by the Central or State Government, statutory organisations, court etc., have taken into consideration and wherever any specific permission is required the lessee will approach the concerned authorities to be submitted.
28. The lessee may also give an undertaking to the effect that all the measures proposed in the closure plan will be implemented in a time bound manner as proposed.